

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

MAUREEN A. HUTSON,)	Case No. 8:08-cv-00283-LES-TDT
)	
Plaintiff,)	
)	
v.)	UNNOPPOSED MOTION
)	FOR EXTENSION OF
WELLS DAIRY, INC., an Iowa)	DISCOVERY DEADLINES
corporation,)	
)	
Defendant.)	

COMES NOW Plaintiff, Maureen A. Hutson, by and through undersigned counsel, and hereby moves the Court for an Order extending the deadline for expert and lay witness disclosure in the above-captioned matter. In support of her Motion, Plaintiff states and alleges as follows:

1. That the Court entered a scheduling order in the above-captioned matter setting various deadlines to include the disclosure of non-expert witnesses thirty (30) days prior to the deposition deadline on December 15, 2008 and the disclosure of Plaintiff's expert witness on November 17, 2008. See filing no. 16.

2. That on or about August 25, 2008, Defendant filed a Motion for Summary Judgment (filing no. 21) challenging Plaintiff's compliance with the applicable statutes of limitation, to which Motion was fully brief by the parties on or about September 26, 2008.

3. That in order to spare the parties further expense in the form of expert witness fees should the Court grant Defendant's Motion for Summary Judgment, the parties seek an extension of certain discovery deadlines to include the disclosure of expert witnesses.

4. That Plaintiff believes that a 21-day extension of the following deadlines would be appropriate:

- a. **Witness Disclosure** - Each party shall provide to all other parties the name, address and telephone number of each witness whom the party expects to present at trial other than solely for impeachment purposes, separately identifying those whom the party expects to present and those whom the party may call if the need arises, not later than December 8, 2008.
- b. **Expert Witness Disclosure** - On or before December 8, 2008, the parties shall identify all expert witnesses and shall serve each other party with the statement required by Fed.R.Civ.P. 26(a)(2) regarding each such expert witness whom they expect to call to testify at trial pursuant to the provisions of Fed.R.Evid. 702, 703 or 705.

5. That the undersigned has conferred with counsel for Defendant who indicates that he has no objection to the relief requested herein.

WHEREFORE, Plaintiff respectfully request that the Court enter an order extending deadlines in the above-captioned matter, all as set forth above.

DATED this 17th day of November, 2008.

MAUREEN A. HUTSON, Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2008, I electronically filed the foregoing Motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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